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FILED
Clerk
District Court

NOV 02 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

7 **UNITED STATES DISTRICT COURT**
8 **FOR THE**
9 **NORTHERN MARIANA ISLANDS**

10 **TOSHIHIRO TAKAHASHI,**

11 **Plaintiff,**

12 **vs.**

13 **MAEDA PACIFIC CORPORATION,**

14 **Defendant.**

CIVIL ACTION NO. CV 05-0026

**PLAINTIFF'S PRE-DISCOVERY
DISCLOSURE STATEMENT**

15
16 COMES now Plaintiff Toshihiro Takahashi, through undersigned counsel and pursuant to
17 the Federal Rules of Civil Procedure Rule 26(a)(1) and D.N.M.I. Local Rule 16.2CJ(d) and
18 hereby make the following disclosures:

19
20 Disclosures pursuant to Rule 26(a)(1)(a):

21 Plaintiff is currently aware of the following individuals who are likely to have
22 discoverable information that he may use in case:

23
24 A. Mr. Keith C. Ada

25 Box 501235 CK

26 Cell. # 285-3274

27
28 Mr. Linus Mizutani

1 Hm. # 234-5185

2 Wk. # 664-3982 San Vicente Elementary

3
4 Mr. Dexter Macaranas

5 Hm.# 233-5603

6
7 It is believed that the above individuals witnessed all or part of the incident which is the
8 subject matter of the litigation. The incident occurred on March 17, 2005.

9
10 Disclosure Pursuant to Rule 26(a)1(b):

11 Plaintiff is currently aware of the following documents, data compilations, and tangible
12 things that are in his possession, custody or control, and that he may use to support his case:

13 Photographs of the location of the incident and photographs of Plaintiff, depicting some
14 injuries. Plaintiff also has some medical records in his custody or control.

15
16 Disclosure Pursuant to Rule 26(a)1(c), Computation of Damages:

17 Plaintiff has not computed the damages at this time.

18
19 RESPECTFULLY submitted this 2nd day of November, 2005.

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21 ~~TORRES BROTHERS & FLORES, LLC.~~

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23 VICTORINO DLG, TORRES Attorneys for
24 Toshihiro Takahashi, Plaintiff
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